

WEIL, GOTSHAL & MANGES LLP
 767 Fifth Avenue
 New York, New York 10153
 Telephone: (212) 310-8000
 Facsimile: (212) 310-8007
 Jacqueline Marcus

Attorneys for Lehman Brothers Holdings Inc.
 and Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**NOTICE OF HEARING ON PLAN ADMINISTRATOR'S
 OBJECTION TO CLAIMS OF U.S. BANK, NATIONAL ASSOCIATION**

PLEASE TAKE NOTICE that on July 19, 2013, Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the "Plan"), filed its objection to certain claims of U.S. Bank, National Association, as trustee for certain securitization trusts (the "Objection"), and that a hearing (the "Hearing") to consider the Objection will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **August 29, 2013 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses to the Objection must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in

accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served, in accordance with General Order M-399, on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Plan Administrator, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Jacqueline Marcus, Esq.); and (iii) the Office of the United States Trustee for Region 2, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Tracy Hope Davis, Esq., Susan Golden, Esq., and Andrea B. Schwartz, Esq.); so as to be so filed and received by no later than **August 22, 2013 at 4:00 p.m. (Eastern Time)** (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Objection or any claim set forth thereon, the Plan Administrator may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Objection, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: July 19, 2013
New York, New York

/s/ Jacqueline Marcus
Jacqueline Marcus

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Jacqueline Marcus

Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**PLAN ADMINISTRATOR'S
OBJECTION TO CLAIMS OF U.S. BANK, NATIONAL ASSOCIATION**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. ("LBHI" and the "Plan Administrator"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the "Plan"), respectfully represents:

Relief Requested

1. The Plan Administrator files this objection to certain claims of U.S. Bank, National Association, as trustee for certain securitization trusts ("U.S. Bank"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and this Court's order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the "Procedures Order") (ECF No. 6664), seeking to disallow and expunge the claims listed on Exhibit A annexed hereto.

2. The Plan Administrator has examined the proofs of claim identified on Exhibit A (collectively, the “No Liability Claims”) and has determined that the No Liability Claims should be disallowed and expunged on the basis that they provide no basis for liability as to LBHI and/or Structured Asset Securities Corporation (“SASCO,” together with LBHI, the “Chapter 11 Estates”). After a review of U.S. Bank’s supporting documentation and the Chapter 11 Estates’ books and records, the Plan Administrator has determined that the Chapter 11 Estates do not owe any amounts to U.S. Bank in connection with the No Liability Claims. The No Liability Claims, therefore, do not constitute valid *prima facie* claims, and the Plan Administrator requests that they be disallowed and expunged in their entirety.

3. The Plan Administrator reserves all of its rights to object on any other basis to any No Liability Claim as to which the Court does not grant the relief requested herein.

Jurisdiction

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Background

5. Commencing on September 15, 2008 and periodically thereafter (as applicable, the “Commencement Date”), LBHI and certain of its subsidiaries, including SASCO, commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”). The Chapter 11 Cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b).

6. On January 14, 2010, the Court entered the Procedures Order. The Procedures Order authorizes the filing of omnibus objections to no more than 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

7. On December 6, 2011, the Court approved and entered an order confirming the Plan (ECF No. 23023). The Plan became effective on March 6, 2012.

8. Pursuant to the Plan, the Plan Administrator is authorized to interpose and prosecute objections to claims filed against the Chapter 11 Estates.

The No Liability Claims

9. Prior to the Commencement Date, various Lehman entities were involved in the business of securitizing loans secured by commercial real property (the “Loans”). The Loans were generally originated by LBHI or one of its subsidiaries and then transferred, directly or indirectly, to SASCO. SASCO then sold the Loans into various trusts specifically established to hold the Loans and isolate same from the credit risk of the other entities involved in the securitization process. In order to raise capital to fund the acquisition of the Loans, the Trusts issued securities (generally in the form of certificates) to third-party investors (the “Certificate Holders”) who are entitled to share in the income (after administrative expenses) generated by the Loans.

10. U.S Bank and Bank of America, National Association (“BofA”), in their respective capacities as trustees for certain of these securitization trusts (the “Trusts”), are responsible for administering the Trusts on behalf of the Certificate Holders.

11. U.S. Bank and BofA allege in the No Liability Claims that LBHI and/or SASCO (i) made certain representations and warranties regarding the Loans, (ii) incurred certain obligations in connection with the sale of the Loans into the Trusts, including with respect to the delivery of certain documents, and/or (iii) agreed to cause the recordation of certain documents related to the Loans.¹ In the event of a breach or failure of performance with regard to the above,

¹ In addition to the above, certain of the No Liability Claims filed by US Bank assert alternative theories relating to early payment defaults and LBHI’s alleged role as servicer, though U.S. Bank acknowledges that such alternative theories are asserted as protective claims and that it has been unable to identify any

and provided that such breach or failure of performance materially and adversely affects the interest of the Certificate Holders, U.S. Bank and BofA allege that LBHI and/or SASCO are required to cure the breach or failure of performance, repurchase the affected Loan(s), or substitute a qualifying mortgage loan(s) for the affected Loan(s). The No Liability Claims are, therefore, dependent on the existence of a breach or failure of performance on the part of the Chapter 11 Estates, which breach or failure of performance has materially and adversely affected the interests of the Certificate Holders of one or more of the Trusts.

12. U.S. Bank filed a notice of transfer (the “Transfer Notice”) on May 25, 2011 that reflects the transfer of BofA’s No Liability Claims to U.S. Bank (ECF No. 17234). According to the Transfer Notice, on or about November 11, 2010, U.S. Bank acquired various trust assets from BofA and certain of its affiliates. These trust assets included BofA’s interest in the No Liability Claims. Accordingly, U.S. Bank is the holder of record for all of the No Liability Claims.

The No Liability Claims Should Be Disallowed and Expunged

13. The No Liability Claims appear to have been filed as protective claims. While U.S. Bank and BofA allude to the existence of certain alleged breaches of representations and warranties by the Chapter 11 Estates and/or failures, on the part of the Chapter 11 Estates, to discharge certain obligations, no specific allegations are included in the No Liability Claims. Moreover, the Plan Administrator has conducted a limited investigation and has been unable to identify any breach or failure of performance that would result in liability in connection with the Loans. Consequently, the No Liability Claims do not constitute valid *prima facie* claims.

specific basis for liability in connection therewith. In the event that U.S. Bank seeks to supplement any of the No Liability Claims, the Plan Administrator reserves its right to object to such claims for any reason.

14. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelpia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at *15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000). Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1).

15. The Plan Administrator has evaluated the No Liability Claims, the exhibits attached thereto, and Lehman’s own records relating to the Loans and the Trusts and has been unable to identify any liability on the part of the Chapter 11 Estates.

16. The Effective Date has occurred and distributions began on April 17, 2012. If the No Liability Claims remain on the claims register in the filed amount, the potential exists for recoveries by parties who do not hold valid claims against the Chapter 11 Estates. Accordingly, the Plan Administrator respectfully requests that the Court disallow and expunge each No Liability Claim in its entirety.

Notice

17. No trustee has been appointed in these chapter 11 cases. Notice of this Objection has been served on (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) U.S. Bank; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010

governing case management and administrative procedures for these cases (ECF No. 9635). The Plan Administrator submits that no other or further notice need be provided.

18. No previous request for the relief sought herein has been made by the Plan Administrator or the Chapter 11 Estates to this or any other Court.

WHEREFORE the Plan Administrator respectfully requests entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: July 19, 2013
New York, New York

/s/ Jacqueline Marcus
Jacqueline Marcus

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates

Exhibit A

EXHIBIT A - OBJECTION TO CLAIMS OF U.S. BANK, N.A.

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16400	Undetermined	Entire Claim	None
2 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16401	Undetermined	Entire Claim	None
3 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16402	Undetermined	Entire Claim	None
4 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16403	Undetermined	Entire Claim	None
5 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16406	Undetermined	Entire Claim	None
6 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16407	Undetermined	Entire Claim	None
7 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16408	Undetermined	Entire Claim	None
8 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16410	Undetermined	Entire Claim	None
9 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16412	Undetermined	Entire Claim	None
10 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16414	Undetermined	Entire Claim	None
11 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16429	Undetermined	Entire Claim	None

EXHIBIT A - OBJECTION TO CLAIMS OF U.S. BANK, N.A.

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
12 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16430	Undetermined	Entire Claim	None
13 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16432	Undetermined	Entire Claim	None
14 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16433	Undetermined	Entire Claim	None
15 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16436	Undetermined	Entire Claim	None
16 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16437	Undetermined	Entire Claim	None
17 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16442	Undetermined	Entire Claim	None
18 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16443	Undetermined	Entire Claim	None
19 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19261	Undetermined	Entire Claim	None
20 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19262	Undetermined	Entire Claim	None
21 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19263	Undetermined	Entire Claim	None
22 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19265	Undetermined	Entire Claim	None

EXHIBIT A - OBJECTION TO CLAIMS OF U.S. BANK, N.A.

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
23 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19281	Undetermined	Entire Claim	None
24 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19282	Undetermined	Entire Claim	None
25 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19284	Undetermined	Entire Claim	None
26 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19285	Undetermined	Entire Claim	None
27 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19286	Undetermined	Entire Claim	None
28 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19287	Undetermined	Entire Claim	None
29 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19288	Undetermined	Entire Claim	None
30 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19290	Undetermined	Entire Claim	None
31 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20381	Undetermined	Entire Claim	None
32 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20382	Undetermined	Entire Claim	None
33 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20385	Undetermined	Entire Claim	None

EXHIBIT A - OBJECTION TO CLAIMS OF U.S. BANK, N.A.

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
34 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20386	Undetermined	Entire Claim	None
35 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20387	Undetermined	Entire Claim	None
36 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20388	Undetermined	Entire Claim	None
37 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20389	Undetermined	Entire Claim	None
38 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	20498	Undetermined	Entire Claim	None
39 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20499	Undetermined	Entire Claim	None
40 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	20509	Undetermined	Entire Claim	None
41 U.S. BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20588	Undetermined	Entire Claim	None
42 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	20589	Undetermined	Entire Claim	None
43 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23080	Undetermined	Entire Claim	None
44 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23081	Undetermined	Entire Claim	None

EXHIBIT A - OBJECTION TO CLAIMS OF U.S. BANK, N.A.

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
45 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23082	Undetermined	Entire Claim	None
46 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23228	Undetermined	Entire Claim	None
47 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23229	Undetermined	Entire Claim	None
48 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23230	Undetermined	Entire Claim	None
49 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23233	Undetermined	Entire Claim	None
50 US BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16411	Undetermined	Entire Claim	None
51 US BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16438	Undetermined	Entire Claim	None
52 US BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16439	Undetermined	Entire Claim	None
53 US BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16440	Undetermined	Entire Claim	None
54 US BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/18/2009	16441	Undetermined	Entire Claim	None
55 US BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19289	Undetermined	Entire Claim	None

EXHIBIT A - OBJECTION TO CLAIMS OF U.S. BANK, N.A.

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
56 US BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20383	Undetermined	Entire Claim	None
57 US BANK NATIONAL ASSOCIATION	09-10558 (JMP)	Structured Asset Securities Corporation	09/21/2009	20384	Undetermined	Entire Claim	None
58 US BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23231	Undetermined	Entire Claim	None
59 US BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23232	Undetermined	Entire Claim	None
TOTAL					\$0.00	\$0.00	

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING PLAN ADMINISTRATOR'S
OBJECTION TO CLAIMS OF U.S. BANK, NATIONAL ASSOCIATION**

Upon the objection, dated July 19, 2013 (the "Objection"),¹ of Lehman Brothers Holdings Inc. ("LBHI" and the "Plan Administrator"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the "Plan"), pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007(d) and the Procedures Order, to claims of U.S. Bank, National Association, as Trustee for certain securitization trusts, seeking disallowance and expungement of the No Liability Claims on the grounds that the No Liability Claims assert claims for which the Chapter 11 Estates have no liability, all as more fully described in the Objection; and due and proper notice of the Objection having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) U.S. Bank; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases (ECF No. 9635); and the Court having found and determined that the relief sought in the Objection is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

legal and factual bases set forth in the Objection establish just cause for the relief granted herein;
and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Objection is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims
listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice;
and it is further

ORDERED that the Chapter 11 Estates' court appointed claims and noticing
agent is authorized and directed to delete the No Liability Claims from the official claims
registry; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all
matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE